

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2022 MAR 22 PM 5:01

OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSHUA SUND,

Defendant.

4:22CR 3026

INDICTMENT
18 U.S.C. § 2251(a)

The Grand Jury charges that

COUNT I

On or about September 17, 2018, within the District of Nebraska, JOSHUA SUND, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct and acts that are indistinguishable from that of a minor engaging in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT II

On or about November 14, 2018, within the District of Nebraska, JOSHUA SUND, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct and acts that are indistinguishable from that of a minor engaging in sexually explicit conduct for the purpose of producing any visual depiction of such conduct,

knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT III

On or about January 8, 2019 within the District of Nebraska, JOSHUA SUND, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct and acts that are indistinguishable from that of a minor engaging in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT IV

On or about October 16, 2019, within the District of Nebraska, JOSHUA SUND, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct and acts that are indistinguishable from that of a minor engaging in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed,

shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT V

On or about January 9, 2020, within the District of Nebraska, JOSHUA SUND, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct and acts that are indistinguishable from that of a minor engaging in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.



TESSIE L. SMITH
Assistant United States Attorney